

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DIVISION

In Re:

Terrance Keith Sullivan

Case No. 20-00641-5-JNC

Chapter 13

Social Security No.: xxx-xx-7984

Address: 1033 Oakstone Drive, Fayetteville, NC 28314

Debtors

OPPOSITION TO MOTION

The Debtors, by and through the attorney undersigned, hereby oppose the Objection to Claim filed by CHAPTER 13 TRUSTEE (hereinafter the “trustee”), and dated 3/9/2020 entirety, based upon the following:

Upon information and belief, the claim should be declared secured as shown on the attached Exhibit A. Additionally, since the Debtor’s attorney is doing the due diligence for the creditor in an effort to protect the Debtor’s source of transportation, then the Debtor’s attorney requests the creditor’s claim be reduced by \$500.00 in order to provide Debtor attorney with a \$500.00 fee for the work in opposing the objection to claim.

WHEREFORE the Debtors pray that the Court deny the said trustee’s objection to claim, award \$500.00 attorney fee, set this matter for hearing, and provide such other relief as to the Court seems just and proper.

Dated: March 12, 2020

LAW OFFICES OF JOHN T. ORCUTT, P.C.

/s Josh Hillin

Josh Hillin

Attorney for Debtors

N.C. State Bar No. 28288

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Raleigh, N.C. 27615

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CERTIFICATE OF SERVICE

I, Charlene Ennemoser, of the Law Offices of John T. Orcutt, P.C., certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age, and that on March 12, 2020, I served copies of the foregoing **Opposition to Objection to Claim**, by automatic **electronic noticing** upon the following parties:

Joseph A. Bledsoe, III
Chapter 13 Trustee

Bankruptcy Administrator

by **regular U.S. mail**, upon the following parties:

Performance Finance
Attn: Managing Officer / Agent
10509 Professional Circle, Ste 202
Reno, NV 89521

Terrance Keith Sullivan
1033 Oakstone Drive
Fayetteville, NC 28314

/s Charlene Ennemoser

Charlene Ennemoser